IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

MARTEN GROUP, INC. d/b/a SENERGY MEDICAL GROUP and SCOTT TENNANT,

Plaintiffs,

v.

JERALD TENNANT, MD, JOHN TENNANT, TERESA JESSEN TENNANT, JARED TENNANT, TENNANT DEVICES AND ACCESSORIES, LLC, and CURADOR, LLC, Defendants.

Case No. 3:24-cv-01852

JURY TRIAL DEMANDED

JOINT MOTION FOR EXTENSION OF TIME FOR DEFENDANTS' EXPERT DESIGNATION AND REPORT

Defendants Jerald Tennant, M.D., John Tennant, Teresa Jessen Tennant, Jared Tennant, Tennant Devices and Accessories, LLC, and Curador, LLC (together, "Defendants") and Plaintiffs Marten Group, Inc., d/b/a Senergy Medical Group and Scott Tennant (together, "Plaintiffs"), jointly seek an extension of time for Defendants' Expert Designation and Report. In support of this request, the parties show the Court as follows:

- 1. The Court's scheduling order set the date for Defendants' Expert Designation and Report for May 26, 2025. Dkt. 31.
- 2. On March 3, 2025, defendants issued discovery requests to plaintiff

Senergy, which were due on April 2, 2025. Those requests encompass documents pertinent to consumer confusion and the parties' trademark disputes.

- 3. On April 8, 2025, the parties conferred about search terms and other limiters in compliance with the parameters set forth in the Court's scheduling order.
- 4. The parties continued to confer on the status of Plaintiffs' document production throughout April and early May. Plaintiffs initially indicated that production would be complete on May 16, but due to the size of the production, Plaintiffs requested additional time to produce. Plaintiffs served responsive documents on May 21.
- 5. To afford Defendants time to review the production, investigate the completeness of the production, and provide any relevant documents to its expert to consider, formulate opinions, and incorporate them into a written report, the parties agreed to a one-week extension of the deadline for Defendants' Expert Designation and Report from May 26 to June 2, 2025.

Therefore, based on the foregoing, the parties respectfully request that this Court extend the deadline for Defendants' Expert Designation and Report to June 2, 2025.

Dated: May 21, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon all counsel of record through CM/ECF on May 21, 2025.

By: <u>/s/Tyler L. Farmer</u>
Tyler L. Farmer

CERTIFICATE OF WORD COUNT

Pursuant to Section II.A. of the Court's Procedures for Cases Assigned to District Judge Ada Brown and Standing Order, the undersigned hereby certifies that, per the word-processor register, the foregoing Motion contains 269 words, excluding the case caption, signature block, and certificates.

By: <u>/s/Tyler L. Farmer</u> Tyler L. Farmer

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i), the undersigned certifies that the parties have complied with the meet and confer requirements of Local Rule CV-7(h) and that the foregoing motion and relief sought therein is unopposed.

By: <u>/s/Tyler L. Farmer</u>
Tyler L. Farmer